BEFORE

THE PUBLIC SERVICE COMMISSION OF

SOUTH CAROLINA

DOCKET NO. 2013-42-S

IN RE:	Application of Palmetto Utilities, Inc.,	
	For adjustment of rates and charges for, and)	DIRECT TESTIMONY
	Modification to Certain Terms and	OF MIKE PIPPIN
	Conditions Related to, the Provision of)	
	Sewer Service.	

- Q. Please state your name and business address:
- A. I am Mike Pippin. My business address is 3924 Forest Drive, Suite 12, Columbia, South Carolina, 29204.
- Q. Where are you employed and in what capacity?
- A. I am employed by Sensor Enterprises, Inc., as Director of Operations.
- Q. What is the business of Sensor Enterprises, Inc?
- A. Sensor owns and operates several McDonald's restaurants including a McDonald's located at 250 Blythewood Road.
- Q. What is your background and experience in the restaurant business?
- A. I've worked for McDonald's for 38 years; I have been employed with Sensor Enterprises since 1992. I have spent my entire career in restaurant operations.
- Q. What water and wastewater utilities serve this McDonald's?
- A. This McDonald's receives water service from the Town of Winnsboro. It receives wastewater service from Palmetto Utilities, Inc.
- Q. What is the purpose of your testimony?

- A. I am testifying on behalf of Sensor Enterprises, Inc., to respond to the proposed rate increase for Sensor's McDonald's at 250 Blythewood Road, requested by Palmetto Utilities, specifically, the assumptions which form the basis for the increase and the dramatic proposed increase itself. I will show that the assumptions are incorrect and that the amount of the increase is unjust and unreasonable.
- Q. Please explain why the basic assumptions for the rate proposed to be charged are incorrect.
- A. Palmetto proposes to charge on the basis of a DHEC regulation (61-67) which assumes a waste discharge of 40 gallons per day per drive-in car served. Palmetto further assumes an average of 1,400 cars served per day, or 56,000 gallons per day. This results in an assumed thirty day month discharge of 1,680,000 gallons. In addition, Palmetto assumes a seat count of 120 seats and assumes a discharge of 40 gallons per day per seat resulting in 144,000 gallons discharged per month. The total of these two assumptions is 1,824,000 gallons per month. This amount is demonstrably and significantly incorrect as shown by the average monthly water consumption records I have produced as **Exhibit "A,"** which reveal that the average monthly water usage is 86,000 gallons. Our records show that the actual number of cars served per day is about 1,035, not 1,400 as assumed by Palmetto.
 - Q. Please explain why the proposed increase is unjust and unreasonable.
 - A. Initially, it is shocking, an increase of about 1165 percent. As shown by recent billings, the average monthly charge has been about \$401.52. However, the proposal in this case is

\$4,680.43. To the best of our knowledge, only customers in our category are being asked to pay such an increase. It is unjust and unreasonable to ask us to pay an exorbitant increase and to bear a disproportionate share of the revenue requested. It is also unjust and unreasonable to charge for the maximum possible daily use when that amount is more than 1.7 million gallons more per month than the real usage.

Q. What is your response to the general increase requested by Palmetto?

A. We are in business too, and understand the need to earn a profit. While the overall rate of return proposed by Palmetto is for this Commission to decide, the amount Palmetto proposes to charge our McDonald's is significantly out of proportion to other customers. Sensor owns and operates other McDonald's in the Columbia area and the typical monthly charge for water and sewer is about \$571.64. We are unopposed to a reasonable rate increase.

Q. Do you have a suggestion about how you might be charged?

A. I suggest that the charge be based upon actual water usage. In its Application, Exhibit A, paragraph 12, Palmetto states that it is relying on the Single Family Equivalent in Regulation 61-67 as previously noted. However, Palmetto states that it, "...shall have the right to request and receive water usage records from the provider of water...." Palmetto states that, "If it is determined that actual flows or loadings are greater than the design flows or loadings, then the utility shall recalculate the customer's equivalency rating based on actual flows or loadings and thereafter bill for its services in accordance with such recalculated loadings." I submit that this approach should be used both to decrease the equivalency rating and to

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JULY 1, 2013

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increase it. It is unfair and unreasonable for the utility to be allowed to increase its charge based upon actual water usage but not to allow the customer to decrease the charge on the same basis.

- Q. Does this conclude your testimony?
- A. Yes, it does.

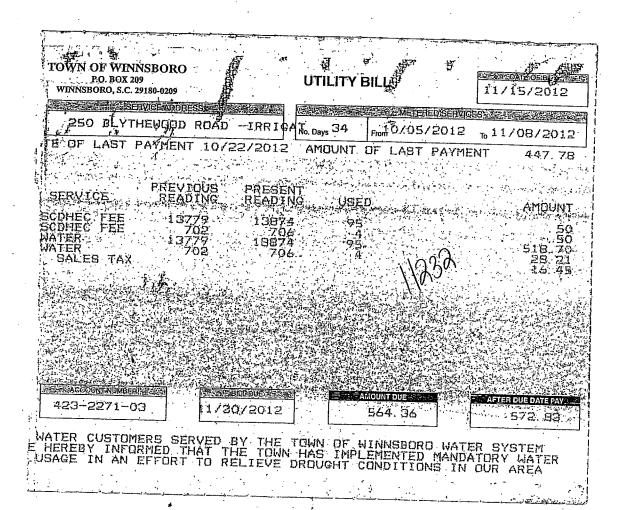
DOCKET NO. 2013-42-S

DIRECT TESTIMONY OF MIKE PIPPIN

EXHIBIT A

W	ater Consumption		
McDonald's - 250	Blythewood Road		·
From	То	Gallons Billed	Cubic Feet
12/15/2011	1/13/2012	90,000	12,000
1/13/2012	2/10/2012	66,000	8,800
2/10/2012	3/12/2012	84,000	11,200
3/12/2012	4/10/2012	93,000	12,400
4/10/2012	5/10/2012	84,000	11,200
5/10/2012	6/5/2012	70,000	9,333
6/5/2012	7/6/2012	95,000	12,667
7/6/2012	8/7/2012	102,000	13,600
8/7/2012	9/7/2012	87,000	11,600
9/7/2012	10/5/2012	74,000	9,867
10/5/2012	11/8/2012	95,000	12,667
11/8/2012	12/11/2012	88,000	11,733
	Total	1,028,000	137,067
	Average	85,667	11,422

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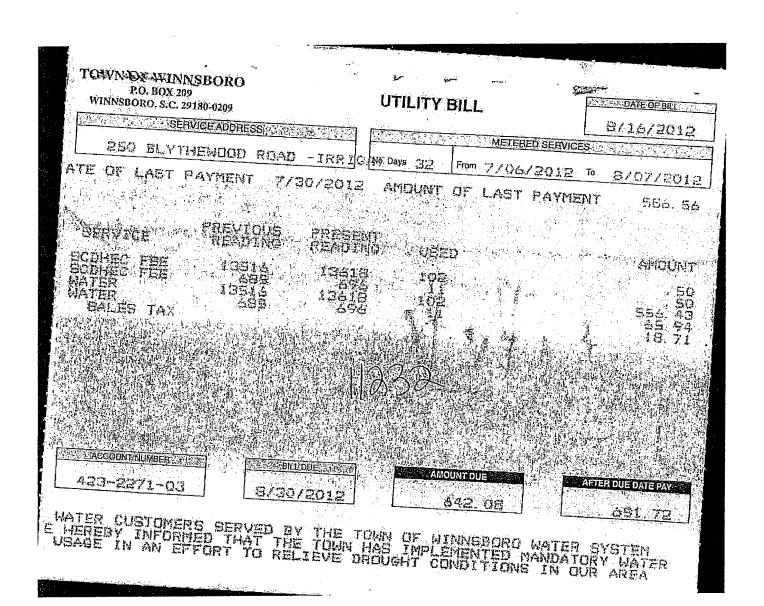
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Palmetto Utilities, Inc. 1713 Suite A Woodcreek Farms Road Elgin, South Carolina 29045 (803) 699-2422

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All rate schedules are approved by the S.C. Public Service Commission and are available for viewing at our office. For emergencies call 803-699-2422 (24 hours a day)

All past due accounts are subject to a \$25,00 Certified Notification Fee

Billing Date 1/8/2013

ACCOUNT NUMBER 6136' SERVICE FROM, SERVICE TO 12/1/2012 12/31/2012	DUE DATE PREVIOUS BALE 1/31/2013 \$0.00 NEW CHARGES	
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1713 Suite A Woodcreek Farms Road Elgin, South Carolina 29045 (803) 699-2422 Palmetto Utilities, Inc

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Palmetto Utilities, Inc 1713 Suite A Woodcreek Farms Road Elgin, South Carolina 29045 (803) 699-2422

Billing Date 10/4/2012

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Closed Saturday and Sunday 8:30 A.M. To 4:30 P.M.

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(803) 699-2422

6136 Reconnect Franchise Fee Sewer 8/1/2012 8/31/2012 SERVICE FROM SERVICE TO ACCOUNT NUMBER Late Penalty SERVICE ADDRESS 250 BLYTHEWOOD RD Billing Date 9/5/2012 DUE DATE PREVIOUS BALANCE 9/30/2012 \$0.00 \$382.40 \$0.00 \$0.00 \$19.12 NEW CHARGES \$401.52 TOTAL AMOUNT DUE

Office Hours: 8:30 A.M. To 4:30 P.M.

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1713 Suite A Woodcreek Farms Road Elgin, South Carolina 29045 (803) 699-2422 Palmetto Utilities, Inc

Billing Date 8/7/2012

SERVICE ADDRESS 250 BLYTHEWOOD RD	Sewer Late Penalty Reconnect Franchise Fee	ACCOUNT NUMBER 6136 SERVICE FROM SERVICE TO 7/1/2012 7/31/2012
		DUE DATE 8/31/2012
TOTAL AMOUNT DUE \$401.52	\$382.40 \$0.00 \$0.00 \$19.12	\$0.00 NEW CHARGES



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(24 hours a day)

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1713 Suite A Woodcreek Farms Road Elgin, South Carolina 29045 (803) 699-2422 Palmetto Utilities, Inc.

Billing Date 7/12/2012

SERVICE ADDRESS 250 BLYTHEWOOD RD	Sewer Late Penalty Reconnect Franchise Fee	ACCOUNT NUMBER 6136 SERVICE FROM SERVICE TO 6/1/2012 6/30/2012
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250 BLYTHEWOOD RD

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